

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

JERIANNE R. VOORHEES,

Plaintiff,

v.

ANDREW M. SAUL,
Commissioner of Social Security,

Defendant.

Case No.: 2:20-cv-00916-JDP

STIPULATION FOR FINAL EXTENSION
OF TIME FOR PLAINTIFF TO FILE
OPENING BRIEF

ECF No. 17

IT IS STIPULATED, by and between the parties, through their respective counsel of record, that the time for Plaintiff to file her motion for summary judgment be extended for a final thirty (30) day period, such that Plaintiff's motion, with the Court's approval, will be due to be filed by January 18, 2021. This is Plaintiff's second request for an extension of time. Plaintiff's counsel apologizes for the delay but needs additional time to properly prepare Plaintiff's motion for summary judgment because in the last 30 days Plaintiff's counsel has had multiple filing deadlines in other social security matters pending in district court and an appearance before the Ninth Circuit; in the last 30 days Plaintiff's counsel has been responsible for handling or assisting with two mediations in complicated state court litigation matters pending in Sonoma County and Santa Clara County; in the last 30 days counsel was responsible for filing five separate motions to compel discovery in two additional pending state court matters venued in Sacramento County and Santa Clara County; as well as ongoing childcare responsibilities relating to counsel's young children not attending in-person school currently. With the Court's approval, the parties further stipulate that all other dates

1 in the Court's Scheduling Order be extended accordingly.

2 Dated: December 17, 2020

Respectfully submitted,

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4 /s/ Jared T. Walker

5 Jared T. Walker,
6 Attorney for Plaintiff

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8 SO STIPULATED:

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10 McGREGOR W. SCOTT
11 United States Attorney

12 Dated: December 17, 2020

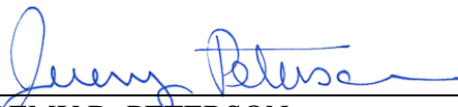
13 By: /s/ *S. Wyeth McAdam
14 (*authorized by email on 12/17/2020)
15 S. Wyeth McAdam
16 Special Assistant United States Attorney
17 Attorneys for Defendant
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ORDER

The parties' stipulated second extension of time for plaintiff to file a motion for summary judgment is approved and so ordered.

IT IS SO ORDERED.

Dated: December 21, 2020



JEREMY D. PETERSON
UNITED STATES MAGISTRATE JUDGE